

United States District Court for Massachusetts,
1 Courthouse Way,
Boston, Mass 02210

15-CR-10214

US Dept of Justice

Vs

Daniel Filho

Motion to Consider the Appointment of a Receiver

Motion to Consider the Appointment of a Receiver for Distribution of funds Held By the United States to Victims and to consider the recovery of funds/assets Nationally and Internationally

Now comes the Victim, Gailon Arthur Joy, and would Request the Honorable Court to Appoint A Receiver to Locate and Identify Assets of Daniel Filho, both here and abroad, for purposes of distribution to the real victims of the purported Ponzi Scheme perpetrated by the defendant.

The Honorable Court has appointed receivers in other purported Ponzi Schemes and the receivers recoveries have clearly benefited purported victims, most notably, Rex Venture Group, LLC, et., and has clearly benefited the victims of the scheme.

Upon information and belief, at least some funds were sent internationally via a "exchange of funds" process that were purportedly deposited with foreign banks or entities.

Victims are also aware that the SEC has about \$3.5 Million dollars recovered in its possession and these funds should equitably be released to real victims of the defendant's enterprise.

Wherefore, this victim, having standing as a victim, does move the Honorable Court, to consider the appointment of a receiver to represent the victims and identify recoverable assets and distribute the cash value to properly vetted victims.

Respectfully Submitted,

Gailon Arthur Joy

CC: SEC, 1 Courthouse Way, Suite 9200, Boston, Ma 02210

FILED
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U.S. DISTRICT COURT
DISTRICT OF MASS.

Motion denied without prejudice.

S/M Gorton, USDJ 8/15/17